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5   IN THE UNITED STATES DISTRICT COURT

6   FOR THE DISTRICT OF ARIZONA

7
     UNITED STATES OF AMERICA,   )
8   )   CR-11-1013-TUC-RCC-HCE
                 Plaintiff,   )
9   )
     vs.   )   MOTION FOR DISCLOSURE
10   )
     GHERMON LATEKE TUCKER,   )
11   )
                 Defendant.   )
12   _____)

13
             Pursuant to *Brady v. Maryland*, 373 U.S. 83(1963), and to the Due Process Clause
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     to the United States Constitution, Ghermon Tucker moves this court to order disclosure
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     of documents relating to witnesses in the above-captioned matter.
16
             It is anticipated that the government will call one or more co-defendants at trial.
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     These co-defendants, it is believed, have agreed to cooperate in exchange for benefits
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     provided by the government. The identities of the co-operating witnesses are suspected
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     but not yet known. Nevertheless, it is requested that prior to trial the government
20
     disclose the following information relating to the informants:
21
             1.   Any prior conviction for a felony, the date and place of conviction, and
22
                     any conviction for a misdemeanor involving honesty and truthfulness;
23
             2.   All pre-sentence reports prepared in prior cases of the informant;
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             3.   Pre-sentence report prepared in the instant case;
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4.   All statements made by the informant regarding the instant case as well as all statements about his knowledge of the co-defendants in the instant case;

5.   All mental health records for any treatment received by the cooperating co-defendant for any emotional or mental health disorder including records of all medications used by the cooperating co-defendants either on March 2, 2011 or currently.

Respectfully submitted this 19th day of July, 2012.

By s/ *Dan H. Cooper*
Dan H. Cooper